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*Counsel for Plaintiffs and the Class*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

In re HealthEC LLC Data Breach Litigation	)	No. 2:24-cv-00026 (JKS) (SDA)
_____	)	
	)	<b>NOTICE OF MOTION</b>
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	)	
	)	

To: All Persons on ECF Service List

PLEASE TAKE NOTICE that at such date and time as the Court shall determine Plaintiffs, Allan Bishop, Caroline Cappas, Jessica Fenn, Keith Fielder, Joni Fielder, Gregory Leeb, and Mindy Markowitz, (together “Plaintiffs”), through their undersigned counsel, shall move, on behalf of Plaintiffs and the proposed Class, before the Honorable Stacey D. Abrams, U.S.M.J. at the United States District Court, District of New Jersey, U.S. Post Office & Courthouse, 2 Federal Square, Courtroom PO 9, Newark, NJ 07102, for entry of the proposed preliminary approval Order that, among other things, will, (1) preliminarily approve the proposed Settlement; (2) certify the proposed Settlement Class, appoint Plaintiffs as Class representatives, and appoint Settlement Class Counsel for purposes of the Settlement; (3) approve the form and manner of giving notice of the proposed Settlement to the Settlement Class Members; (4) schedule a hearing to consider final approval of the Settlement; and (5) grant such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Settlement Class Counsel will rely upon the accompanying brief in support and the Declaration of James E. Cecchi and exhibits annexed thereto.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Federal Rules of Civil Procedure, a proposed form of Order is attached.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby requests oral argument.

Dated: March 17, 2025

**CARELLA, BYRNE, CECCHI,  
BRODY & AGNELLO, P.C.**

s/ James E. Cecchi

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-and-

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***Settlement Class Counsel***